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March 26, 2021

Via Email and ECF
Honorable Richard J. Sullivan
United States Circuit Judge
Southern District of New York
40 Foley Square
New York, NY 10007

IT IS HEREBY ORDERED THAT pursuant to 18 U.S.C. § 3006A and Section VIII of the CJA Plan for the Southern District of New York (rev. Oct. 2019), Jenna Dunlap is authorized to review discovery in this case for up to 60 hours at a rate of \$75 per hour.

SO ORDERED.

Dated: March 29, 2021
New York, New York



Richard J. Sullivan
United States Circuit Judge
Sitting by Designation

Re: USA v. Burgess et al., (Tyshawn Burgess)
18 Cr. 373(RJS)

Dear Judge Sullivan:

We recently received a significant amount of discovery from the government to be reviewed before sentencing, much of which involved recorded telephone conversations. While we have been diligently reviewing the discovery, it seems that it would be cost effective to have our in-house paralegal, Jenna Dunlap, review these calls. Ms. Dunlap is a recent addition to our office and thus was not available to review the discovery previously.¹ There are 377 jail calls left to be reviewed (approximately 6032 minutes or 100.5 hours of calls). We are seeking approval of funding for Ms. Dunlap to review the remaining calls. We estimate that it will take approximately 60 hours to review the 377 calls that remain. Therefore, we respectfully request that Ms. Dunlap be authorized to work up to 60 hours, at a rate of \$75 per hour for a total of \$4,500.

I have attached a copy of Ms. Dunlap's resume and paralegal certificate for Your Honor's review in consideration of this request.²

Respectfully submitted,
s/
Lorraine Gauli-Rufo
CJA Attorney for Tyshawn Burgess

Enclosures

cc: All Counsel of Record (*via ECF*) (without enclosures)
Alan Nelson (*via email*) (with enclosures)

¹ We initially had requested to contract a paralegal to review discovery on our initial submitted budget, however, that paralegal was never utilized by us because she was not available.

² We submitted Ms. Dunlap's paralegal certificate and resume as attachments to our submission to Your Honor *via email*.